

EXHIBIT A

David McCraw - FOIA Hours, NYT v. CIA, 16-3098 (JSR)

Date	Task	Hours
4/26/2016	Reviewing and editing complaint	0.50
5/4/2016	Working on pre-conference letter	0.70
5/5/2016	Editing letter	0.30
5/11/2016	Preparing for conference	0.70
5/12/2016	Court conference (split with Army case)	1.00
6/26/2016	Drafting brief; legal research	4.30
6/27/2016	Continuing work on brief	2.20
6/29/2016	Revising section on prior disclosures; conferring with Tali about changes in fact section; revising fact section	1.00
6/30/2016	Further work on brief; editing declaration; editing brief; reviewing motion papers	2.50
7/1/2016	Reviewing and editing brief and reviewing exhibits	1.00
7/24/2016	Reviewing brief of CIA; writing to AUSA	0.80
7/25/2016	Discussing Florez omission with AUSA; conference call with court	0.20
7/28/2016	Researching cases; reviewing CIA brief; writing first draft of reply brief	5.50
7/29/2016	Continuing work on draft of reply brief; editing and revising brief	3.30
8/2/2016	Revising brief and reviewing record	1.00
8/23/2016	Reviewing briefs for oral argument	2.20
8/24/2016	Preparing for oral argument, reading cases, reviewing record, drafting outline, conferring with Tali about argument and attending oral argument	7.50
8/26/2016	Research for call about proposed supplemental briefing; calls with court	0.50
8/30/2016	Reviewing government's motion to supplement; reviewing cases cited by government	0.80
8/31/2016	Drafting opposition to motion; going over case research with Tali	2.00
9/1/2016	Revising opposition to supplement declaration and discussing strategy points with Tali	1.50
11/15/16	Reviewing CIA documents produced	0.50
1/4/17	Researching fees, reviewing hours, drafting letter to AUSA for fee settlement proposal	1.80
1/11/17	Discussing fee settlement with AUSA	0.30
1/17/17	Further discussion with AUSA concerning fees	0.20
1/18/17	Drafting McCraw declaration for fee application; editing first draft	1.20
1/19/17	Research on reasonableness of fees in FOIA cases; drafting declaration for Chris Chivers	0.80
1/23/17	Revising declaration; researching fee awards in other FOIA	1.60

	cases	
1/24/17	Editing draft of memorandum of law; further research on rates for fees in FOIA cases	1.40
1/25/17	Reviewing case law on FOIA fee awards	0.50

TOTAL: 47.80

Tali Leinwand – FOIA Hours, NYT v. CIA, 16-3098 (JSR)

Date	Hours	Work
4/13/16	1.5	Review file and sort out different FOIA requests (CIA and Army) to determine status (one-half charged)
4/25/16	1	Edit complaint and cite-check; compile initiating papers
4/26/16	1	File complaint and initiating papers
5/5/16	.3	Compile copies of all files for AUSA
5/5/16	1.5	Draft pre-conference letter for court, incorporate AUSA's changes, discuss with David and file
5/12/16	1	Travel back and forth to courthouse for status conference in CIA and Army cases; status conference at court (one-half charged)
5/13/16	.1	Phone call with chambers to reschedule oral argument
6/10/16	.1	Phone call with AUSA to review Rakoff's rules re notice of motion
6/20/16	.3	Discuss strategy for brief with David
6/21/16	2.5	Read Duelfer Report section on chemical weapons and compare with reports at issue; review Govt declaration and affidavit; research other official disclosures re chemical weapons
6/22/16	.7	Compile notes on Duelfer Report and discuss with David
6/23/16	1.5	Research official disclosures by CIA; reviewing Duelfer book for statements on disclosures/declassification and the importance of transparency
6/27/16	.2	Discuss brief strategy with David, including framing of statement of facts and declaration
6/27/16	2	Review articles from David re official disclosures; on-line research looking for official disclosures
6/28/16	7	Finding, collecting, and reviewing publications that might be used as official disclosures; reread Chris's story and summarize for facts section
6/29/16	.2	Review brief strategy with David
6/29/16	4	Begin drafting of facts section, incorporating official disclosure materials
6/30/16	.2	Review facts section with David
6/30/16	.2	Draft notice of motion
6/30/16	5	Further work on facts section, incorporate David's edits
6/30/16	1.3	Draft declaration
6/30/16	2	Cite-check facts section
7/1/16	5.5	Compile reports for 13 exhibits; format all documents for filing; final cite-check of brief; file; print for courtesy copies
7/5/16	1	Prepare binder with Tim for courtesy copy to be delivered to court
8/1/16	4.4	Read CIA brief; discuss with David; edit reply brief
8/2/16	.9	Edit reply brief
8/3/16	1	File Reply brief; send courtesy copy to chambers
8/19/16	.5	Print and compile cases for David to prep for argument
8/24/16	3	Review case file and discuss argument strategies with David
8/26/16	.2	Discuss AUSA's request to submit classified declaration with David
8/26/16	.2	Call with chambers re AUSA's request to submit classified declaration

8/26/16	.1	Call with chambers re AUSA's request to submit classified declaration; discuss with David
8/30/16	2	Research on ability of party to file new proof after summary judgment briefing
8/31/16	2	Discuss with David brief challenging government's right to file additional declaration; edit brief
9/1/16	2	Finalize brief and discuss with David; file; send courtesy copy to court

TOTAL: 56.40

Ian MacDougall – FOIA Hours, NYT v. CIA, 16-3098 (JSR)

10/18/16	.2	Call with AUSA & Court about extension of time
10/19/16	.1	Call with AUSA & Court to get Court's ruling on extension request
11/14/16	1	Reviewing CIA production
11/15/16	.5	Drafting status update to court
11/16/16	.4	Editing and filing status update
12/1/16	.1	Call with AUSA and court about scheduling
12/2/16	.7	Determining anticipated challenges to CIA production
12/8/16	.2	Communication with clients about status of case
12/15/16	.2	Discussion with AUSA about updated production
12/16/16	.5	Review of updated production
12/19/16	.7	Call with AUSA and court about settlement & drafting letter to court
12/20/16	.3	Finalizing & submitting letter to court
1/4/17	.1	Reviewing letter to CIA regarding request for fees
1/11/17	.3	Call with AUSA – settlement negotiations
1/17/17	.2	Call with AUSA – settlement negotiations
1/18/17	.1	Call with AUSA & court about fees briefing schedule
1/19/17	2	Researching & drafting fees motion
1/20/17	2	Researching & drafting fees motion
1/24/17	3	Drafting fees motion
1/25/17	3	Discussing fees motion with David, compiling documents for filing, finalizing and filing fees motion

TOTAL: 15.6

Fees and Costs - NYT v. CIA, 16-3098 (JSR)

- Filing fee for complaint - \$400
- Transcript fee from oral argument - \$139.86

TOTAL FEES: **\$539.86**